

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	CHAPTER 7
WORLEY & OBETZ, INC., <i>et al.</i> ¹ ,	:	
	:	
Debtors,	:	Case No. 18-13774-MDC
	:	(Jointly Administered)
CHRISTINE C. SHUBERT, Chapter 7 Trustee for	:	
the Estates of Worley & Obetz, Inc., <i>et al.</i>	:	
	:	Adv. No. 18-00235 (MDC)
v.	:	
	:	
ROBERT SETH OBETZ, an individual;	:	
ROBERT W. OBETZ, JR., an individual;	:	
JEFFREY B. LYONS, an individual;	:	
JUDITH A. AVILEZ, an individual;	:	
KAREN L. CONNELLY, an individual;	:	
MARJORIE S. OBETZ, an individual;	:	
MELISSA OBETZ, an individual;	:	
JULIE LYONS, an individual;	:	
MOLLY S. OBETZ, an individual;	:	
SAMUEL J. OBETZ, an individual;	:	
HOWARD W. CRAMER, JR., an individual;	:	
KATHLEEN A. CRAMER, an individual;	:	
MICHELE K. KLUSEWITZ, a/k/a	:	
MICHELE KELLY, an individual;	:	
149 DOE RUN ROAD, LP, a Pennsylvania	:	
limited partnership;	:	
149 DOE RUN ROAD, GP, LLC, a Pennsylvania	:	
limited liability company;	:	
202 GREENFIELD, LP, a Pennsylvania limited	:	
partnership;	:	
202 GREENFIELD GENERAL, LLC, a	:	
Pennsylvania limited liability company;	:	
535 STIEGEL VALLEY ROAD, LLC, a	:	
Pennsylvania limited liability company;	:	
DOE RUN ROAD, LLC, a Pennsylvania limited	:	
liability company;	:	

¹ The Debtors in these cases, along with the last four digits of their federal tax identification numbers, are (i) Worley & Obetz, Inc. (6576) (Case No. 18-13774-REF); (ii) Americomfort, Inc. (7605) (Case No. 18-13775-REF); (iii) RPHAC, Inc. (9625) (Case No. 18-13776-REF); (iv) Amerigreen Energy, Inc. (6284) (Case No. 18-13777-REF); (v) Advance Air, Inc. (8111) (Case No. 18-13778-REF); (vi) Amerigreen Energy Brokers, LLC (2358) (Case No. 18-13779-REF); (vii) Amerigreen Electricity, LLC (8977) (Case No. 18-13780-REF); (viii) Amerigreen Hedging Services, LLC (8549) (Case No. 18-13781-REF); (ix) Amerigreen Lubricants, LLC (7489) (Case No. 18-13782-REF); (x) Amerigreen Natural Gas, LLC (3222) (Case No. 18-13783-REF); (xi) Amerigreen Propane, LLC (Case No. 18-13784-REF).

OL PARTNERS, LLC, a Pennsylvania limited liability company;
G-FORCE SPORTFISHING, INC., a Delaware corporation;
JW BISHOP PROPERTIES, LLC, a Pennsylvania limited liability company;
LYONS & OBETZ, a Pennsylvania general partnership;
JSB RETENTION, LLC, a Pennsylvania limited liability company;
SETH ENERGY, LLC, a Pennsylvania limited liability company; and
SHIPLEY ENERGY COMPANY, a Pennsylvania corporation;

Defendants.

DEFENDANTS' RULE 26(a)(3) PRETRIAL DISCLOSURES

Pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedures and the Amended Pretrial Order entered on October 16, 2019 [Doc. No. 180], Defendants Molly S. Obetz, Samuel J. Obetz, Howard W. Cramer, Jr., Kathleen A. Cramer, 149 Doe Run Road, LP, 149 Doe Run Road, GP, LLC, 202 Greenfield, LP, 202 Greenfield General, LLC, OL Partners, LLC, G-Force Sportfishing, Inc., JW Bishop Properties, LLC, Lyons & Obetz, JSB Retention, LLC and Seth Energy, LLC, hereby makes the following disclosures:

I. RULE 26(a)(3)(A)(i): IDENTIFICATION OF WITNESSES

A. Witnesses Defendants' Expect to Present

1. Seth Obetz
2. Molly Obetz
3. Samuel J. Obetz
4. Howard W. Cramer, Jr.
5. Kathleen A. Cramer
6. John Reed, Esquire
7. Dave Hess
8. Brian Wassell, CPA
9. Joel Hagaman
10. Robert W. Obetz

B. Witnesses Defendants May Call if the Need Arises

1. Any and all witnesses identified by Plaintiff.
2. Any and all witnesses called by Plaintiff.
3. Any impeachment and rebuttal witnesses as necessary.
4. Any custodian of records necessary to authenticate documents.

II. RULE 26(a)(3)(A)(ii): DEPOSITION DESIGNATIONS

Defendants do not expect to use deposition testimony of any witnesses at trial.

Defendants reserve the right to designate depositions if a witness listed above becomes unavailable.

III. RULE 26(a)(3)(A)(iii): IDENTIFICATION OF EXHIBITS

Defendants expect to offer or utilize the exhibits and/or documents proffered by Plaintiff at trial, including exhibits relating to the solvency of any transferor of money or property at the time of the relevant transfers.

Dated: January 9, 2020

KURTZMAN | STEADY, LLC

By: 

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Howard W. Cramer, Jr., Kathleen A. Cramer, 149
Doe Run Road, LP, 149 Doe Run Road, GP, LLC,
202 Greenfield, LP, 202 Greenfield General, LLC,
525 Stiegel Valley Road, LLC, Doe Run Road,
LLC, OL Partners, LLC, G-Force Sportfishing, Inc.,
JW Bishop Properties, LLC, Lyons & Obetz, JSB
Retention, LLC, and Seth Energy, LLC